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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2011-77**

12 **LAUREN CLARK KNIGHT**  
4041 Radford Ave., Apt. 204  
13 Studio City, CA 91604

**A C C U S A T I O N**

14 Registered Nurse License No. RN 732682

15 Respondent.

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17  
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
22 of Consumer Affairs.

23 2. On or about July 25, 2008, the Board of Registered Nursing (Board) issued  
24 Registered Nurse License No. RN 732682 to Lauren Clark Knight (Respondent). The Registered  
25 Nurse was in full force and effect at all times relevant to the charges brought herein and will  
26 expire on June 30, 2012, unless renewed.

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1 potential unfitness of a registered nurse to practice in a manner consistent with the public health,  
2 safety, or welfare. . .”

3 **COST RECOVERY**

4 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
5 administrative law judge to direct a licentiate found to have committed a violation or violations of  
6 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
7 enforcement of the case.

8 **FIRST CAUSE FOR DISCIPLINE**

9 **(Criminal Conviction)**

10 10. Respondent is subject to disciplinary action under section 2761, subdivision (f) and  
11 490, in conjunction with California Code of Regulations, title 16, section 1444, in that  
12 Respondent has been convicted of a crime substantially related to the qualifications, functions or  
13 duties of a registered nurse, as follows:

14 a. On or about December 17, 2009, after pleading nolo contendere, Respondent was  
15 convicted of one misdemeanor count of violating Vehicle Code section 23152, subdivision (a)  
16 [driving while under the influence of alcohol], in the criminal proceeding entitled *The People of*  
17 *the State of California v. Lauren Clark Knight* (Super. Ct. Los Angeles County, 2009,  
18 No. 9BR03741). Respondent was sentenced to 48 hours in custody and placed on 3 years  
19 probation with certain terms and conditions. The circumstances surrounding the conviction are  
20 that on or about November 22, 2009, Respondent side-swiped a parked vehicle in front of an  
21 establishment. Burbank Police Officers arrested Respondent for operating a motor vehicle while  
22 under the influence of alcohol.

23 **SECOND CAUSE FOR DISCIPLINE**

24 **(Dangerous Use of Alcohol)**

25 11. Respondent is subject to disciplinary action under section 2761, subdivision (a), as  
26 defined in section 2762, subdivision (b), in that Respondent used alcoholic beverages to extent or  
27 in a manner dangerous or injurious to herself, and others. Complainant refers to, and by this  
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1 reference incorporates, the allegation set forth in paragraph 10, subparagraph (a), as though set  
2 forth fully.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Conviction of Involving the Consumption of Alcohol)**

5 12. Respondent is subject to disciplinary action under section 2761, subdivision (a), as  
6 defined in section 2762, subdivision (c), in that on or about November 22, 2009, Respondent was  
7 convicted of a crime involving the consumption of alcohol. Complainant refers to, and by this  
8 reference incorporates, the allegation set forth in paragraph 10, subparagraph (a), as though set  
9 forth fully.

10 **PRAYER**

11 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
12 and that following the hearing, the Board issue a decision:

- 13 1. Revoking or suspending Registered Nurse License No. RN 732682, issued to  
14 Respondent;
- 15 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and  
16 enforcement of this case, pursuant to Business and Professions Code section 125.3; and
- 17 3. Taking such other and further action as deemed necessary and proper.

18 DATED: \_\_\_\_\_

19 7/29/10

20 *Louise R. Bailey*  
21 LOUISE R. BAILEY, M.ED., RN  
22 Interim Executive Officer  
23 Board of Registered Nursing  
24 Department of Consumer Affairs  
25 State of California  
26 Complainant

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